

United States District Court
District of Delaware

Richard C. Hunt,

Plaintiff,

v.

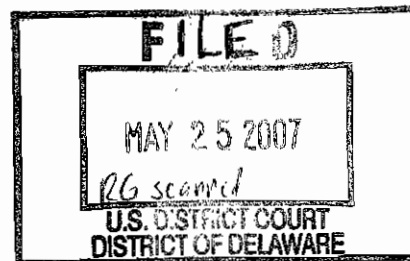
First Correctional Medical
Services, et al.

Defendants.

C.A. No. 04-1417 ***

July of 12 Demanded

Richard C. Hunt Plaintiff: Answers to
Defendants: First Correctional Medicals First
Set of Interrogatories



- A) Richard Coenelious Hunt
- B) N/A
- C) 4.3.79 / Wilmington General
- D) N/A
- E) N/A
- F) 1181 Paddock Rd Wilm, Del. 19977
- G) 222.60.2534
- H) 5'4 174 Pds

② Question High school Makato Minn, H.B. Dupont Middle

- ③ Question
- A) N/A
- B)
- C)
- D)
- E)
- F)
- G)

- ④ Question
- A) N/A
- B)
- C)

⑤ Question

A) Buehrey, Kidnap, Pass with Int RSP DWL

B) I can't remember all dates but resent is Sept 22. 04

New Castle County? Don't have record on most charges

C) 3 1/2 years sentence

- ⑥ Question
- A) N/A
- B)
- C)
- D)

- ⑦ Question
- A) N/A
- B)
- C)
- D)
- E)
- F)
- G)

- ⑧ Question
 A) N/A
 B)
 C)
 D) ↓

- ⑨ Question
 A) Sept 17, 04 / Howard Young Correctional Facility
 B) Accessive force / Broken Mandible
~~C) Unknown date / Unknown hospital~~
~~D) Still Pending~~
 C) Brian Emig / Howard Young Correctional Facility
 D) Still Pending

- Question
 ⑩ Yes

- ⑪ Question
 Sept 17, 04 - Jaw Broken Sept 20, 04 Medical in Prison
 determine it was broke through X-Ray Oct. 17, 04 TAKEN
 to Hospital for Another X-Ray at Christiana Hospital
 The following day Oct. 18, 04 I WAS TAKEN out to
 same Hospital for surgery.

- ⑫ Question
 A)
 B) I Don't understand Question?

- ⑬ Question
 Delayed Medical treatment.

- ⑭ Question
 It was known My Jaw was broken and I wasn't
 Treated in a Timely fashion

- ⑮ Question
 Same Answer as first two ↑

- ⑯ Question
 Don't understand Question?

- ⑰ Question
 Left side of my jaw line / my "left ~~mandible~~ ^{mandible}

A) my Jaw was broken on the left side toward front
 I'm still having trouble chewing, Pain still affects my everyday
 Activity.

- B) MEDICAL STAFF AT 1181 Paddock Rd SMYRNA, DE. 19977
 D) Difficulty Chewing at times, Jaw still hurt from time to time, Trouble sleeping Cause of Pain
 D) For As Mental State of things its long term I really don't know how long the Pain will Affect me One Reason I believe it was a broken bone.
 E) MEDICAL STAFF AT 1181 Paddock Rd. SMYRNA, DE. 19977
 D) ~~IM NOT A DOCTOR~~ I'm not a Doctor!
 G) MEDICAL STAFF AT 1181 Paddock Rd. SMYRNA, DE. 19977

18) A) N/A
 B) ↓
 C) ↓

19) A) N/A
 B) ↓
 C) ↓

20) I HAVE NO ACCESS TO my Medical files
 SO IT'S NOT POSSIBLE TO Answer your Questions!

A) ↓
 B) ↓
 C) ↓
 D) ↓
 E) ↓
 F) ↓

21) A) NO
 B) ↓
 C) ↓
 D) ↓
 E) ↓

Q22 (A) N/A
(B) ↓
(C)

Q23 N/A

Q24 (A) I HAVE NO ACCESS TO MEDICAL FILE TO ANSWER
(B) THE FOLLOWING QUESTIONS.
(C) ↓
(D)
(E)
(F)
(G)
(H)

Q25 (A) N/A
(B) ↓
(C)
(D)
(E)
(F)
(G)
(H)
(I)

Q26 (A) N/A
(B) ↓
(C)
(D)
(E)
(F)
(G)
(H)
(I)

- (A) Sept. 17.04 Howard County Correctional Facility
(B) VERBALLY ASK SAME DATE, FILED GRIEVANCE SAME DATE
Also SICK CALL SLIP, But was told IT WASN'T MY SAW
By Nurse. I was told to wait until Doctor Come in
2 days later for X-Ray.
(C) I was told that DR. DEAMEKO "ORAL SURGEON" HASN'T COME
off of VACATION yet so I was told to wait!
(D) I was kept being told by medic that I'll
be taken out, just wait until "SURGEON" gets back
from VACATION.

28

- 29 (A) I don't understand Questions?
(B) 1. 2. 3. &

- 30 NO
(A)
(B)
1.
2.
3.
4.

31 No

32 N/A

33 N/A

34 Sept. 20.04 — Oct 17.04 The whole time

35

(A) Through out Incident And After surgery
Sept 17. 04 up until '07 I'm still HAVE
Physical Complications ASWELL Mental Health
Issues.

(B) Pain through Jaw Plus it gives MIGRAINS
In head Difficult chewing at times
Deeply Depress.

(C) Through out the whole Incident
Also Sept. 18. 04 Spoken to Nurse Again.

(36) N/A

(37) Yes for surgery.

(38) (A) signed forms of Informed Consent for ORAL
surgery and Anesthesia from The Christiana
Center for ORAL & Maxillofacial Surgery P.A.

(B) Christiana hospital in Eugene M. D'Amico 11
office 10.18.04 10:00 ish

(C) ↑

(D) Eugene M. D'Amico D.D.S. Christiana Hospital
© Lisa Abrams witness and Assistant to Doctor
D'Amico (302) 292-1600

(39) (✓) I Agreed on written documents

(40) (✓) (✓)

(41) CNO

(42) (A) N/A

(B)
(C)
(D)

(43) (A) The 20th of September around 10:20 I was scheduled to go to outside Hospital By Dr. Hernandez.

(B) X-Ray and given Pain Medicine.

(44) (A) Sept 20. 04 / Not shore of Time

(B) Howard Young Correctional Justice Facility

(C) Dr. Hernandez H.Y.C.J.F

(45) (A) NO

(B) N/A

1

2

3

4

(46) It's not the treatment that's the problem, it's the delay in which it was given!

(47) (A) N/A

(B)

(C)

(D)

(48) Nothing was told to me in H.Y.C.J.F Hospital.

(49) (YES) And was told that I'll be fine!

(50) I'll be fine!

(51) (YES) I wanted to know why it's taking so long for surgery or to be seen by Oral Surgeon

~~52 I think I should have been seen sooner~~

(52) I DON'T UNDERSTAND!

(53) (YES)

(54) Civil Rights VS. 42 U.S.C.

Deliberate Indifference by Prison officials to the Medical Needs of a Prisoner Can Amount to a Civil Rights Violation
42 U.S.C. § 1983

(2) Criminal Law Federal Supplement

Prison Officials have Constitutional duty to provide Inmates under their management with Reasonably Adequate food, clothing, shelter, sanitation, medical care and personal safety so as to avoid the imposition of Cruel and Unusual Punishment and Inmate settled with special needs

PRISONS (1) Isolated Incidents of medical malpractice, carelessness or indifference to inmates' medical needs by Guards or Administrators, or Occasional mistakes in processing or classifying an Inmate patient, do not give rise to claims of Constitutional proportion, however a pattern of such occurrences extending over a period of time or existence of systematic deficiencies which will inevitably lead to unnecessary pain and distress constitute proof of deliberate indifference to medical needs of Inmates
U.S.C.A. Const. Amend. (8) (14)

(55) from Sept. 20, 04 to Oct 18, 04 Nothing was done about broken Jaw that clearly shows ~~not~~ deliberate Indifference.

(56) SAME Answer as previous 54 state in Question

(54)

(57) (A) Delayed Medical Treatment for Month

(B) First Correctional Medical

(C) PAIN

(D) Sept. 20, 04 to Oct. 18, 04

(E) Don't Know

(F) Don't Know

(G) Eugene M. D'Amico DR. Hernandez

(H) Documents signed for surgery Also sick call slips

58 "Yes"

59 "Yes"

60 (A) First Correctional Medical

(B) Can't get policy on it At This Time.

(C) Can't get policy on it At This Time.

(D) Can't get policy on it At This Time.

61 (A) Don't Know

(B) Don't understand

62 Don't Know

63 Don't Know

64 (A) NO

(B) NO

(C) NO

(D) NO

65 (A) NO ONE HAS ASK Anything

(B) NO ONE HAS ASK Anything

(C) NO ONE HAS ASK Anything

66 (A) Sept. 19.04 photo's was taken of broken jaw
at H.V.C.J.F

(B) C/O fields Lt. ~~Queen~~ QUEENER ARE witnesses

(C) H.V.C.J.F

(D) Don't understand Question!

(E) I HAVE NEITHER ACCESS TO THEM PLUS I NEVER SEEN THEM SINCE THEY WERE TAKEN.

(67) (1/25)

(A) I WAS GIVEN ~~copies~~ OF MEDICAL COPIES OF ME SIGNATURE FOR SURGERY -

(B) ~~copy~~ Oct. 18.04 AT CHRISTIANA HOSPITAL

(C) Eugene M. D'Amico CHRISTIANA HOSPITAL RICHARD HUNT
SMYRNA CORRECTIONS FACILITY

(68) Don't understand Question

(A) N/A

(B) N/A

(C) N/A

(D) N/A

(69) NO

(A) N/A

(B) N/A

1) Don't Know
2)
3)
4)

(70) I'm NOT ABLE TO GET THAT INFORMATION AT THIS TIME.

(A)

(B) N/A

(C)

(D)

(71) (A) ✓

(B) CAN'T ANSWER AT THIS TIME

(C)

(D) ✓

72) There isn't any claim on that matter.

73) (A) Eugene M. D'Amico ~~Don't~~ ORAL Surgeon
The matter is lengthly delays

(B) Don't understand Question

(C) ORAL Surgeon at CHRISTIAN Hospital

(D) Don't HAVE at this time

(E) Don't HAVE

74) (YES) BRIAN Emig SAME NUMBER AS THIS CASE
I'm REPRESENTING MYSELF FOR NOW

75) I'm NOT INSURANCE

76)
(A) N/A
(B) N/A
(C) N/A
(D) N/A
(E) N/A
(F) N/A

77) NO

(A)
(B)
(C) N/A
(D)
(E)
(F)
(G)

ANSWER

78) I'm NOT SURE / Don't KNOW

79) Don't Know anything about THAT!

80 I don't know anything about that!
(A) TO ANSWER QUESTION

81 Don't know nothing about that!

(A)

(B) N/A

(C)

82 (A) BRAISES TO WIRE JAW
(B) Don't know anything else
(C)
(D)
(E)
(F)
(G)

83 Constant Pain in mouth
Also BAD TOOTH ACHES

84 Trouble sleeping, eating just doing basic

85 EVERYDAY Activities / BAD gum disease
was told by Doctor Eugene M. D'Amico I may need
more surgery.

86 NO I HAVEN'T FILE for Insurance

87 (A) N/A
(B) N/A
(C) N/A
(D) MAY HAVE to HAVE more surgery
(E) N/A

88 I Don't know how much it may cost for future
surgery or treatment

89 ~~Don't~~
Don't know

Question

90 ~~110~~

(A)

(B)

(C)

(D)

N/A

Question

91 I HAVE FILE EVERY ~~GRIEVANCE~~ ^{GRIEVANCE} POSSIBLE WENT TO EVERY HEARING AND WAS DENIED APPEALS I TOOK THE NECESSARY STEPS TO FIND OUT WHY I WAS DELAYED IN GETTING TREATMENT FOR BROKEN JAW.

Question

92 RICHARD C HUNT I USE ALL INFORMATION I HAVE OR KNOWLEDGE TO ANSWER THESE QUESTIONS EVEN WITHOUT DOCUMENTS I DON'T HAVE ACCESS TO!

RICHARD C. HUNT #274714

RICHARD C. HUNT INMATE
SBI NO.; 274714

DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DE. 19977

MAY 18. 2007

IM Richard C. Hunt
UNIT Dw - C-26

SBI#

284714

DELAWARE CORRECTIONAL CENTER

1181 PADDOCK ROAD

SMYRNA, DELAWARE 19977

Office of the Clerk
United States District Court
844 N. King Street, Lockbox 18
Wilmington, Delaware
19801-3570